

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,
AMAZON.COM SERVICES LLC, a Delaware
limited liability company, and AMAZON
TECHNOLOGIES, INC., a Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as
“REKK,” and the following individuals: Oscar
Pineda, Janiyah Alford, Noah Page, Skylar
Robinson, William Walsh, Luke Colvin,
Alejandro Taveras, Andrew Ling, Brandon
Sukhram, Charalampos Gkatzoulas, Cosmin
Sopca, Dylan Hinz, Eric Niezabytowski, Graham
Ferguson, Ivona Brazovskaja, James Garofalo,
Jenny Tran, Johanes Kessel, Jorge Correa, Josh
Davis, Karcper Niepogoda, Olaf Booij, Ryan
Bates, Sai Charan Beeravelli, Simone Antonio
Figura, Zachary Iguelmamene, and Zoha Ahmed,

Defendants.

No. 2:23-cv-01879-JLR

STIPULATED PERMANENT
INJUNCTION AS TO
DEFENDANT GRAHAM
FERGUSON AND PROPOSED
ORDER

NOTED FOR CONSIDERATION:
February 14, 2024

Without Oral Argument

STIPULATION

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies,
Inc. (together, “Amazon”), and Defendant Graham Ferguson (“Ferguson”) and (collectively
“Settling Parties”), by and through Amazon’s respective counsel of record and by Fergusons’
pro-se representation, notify the Court that the Settling Parties have reached a settlement of all

1 claims between them in this matter. Pursuant to the terms of that settlement, the Settling Parties
2 stipulate and agree to entry of the permanent injunction below.

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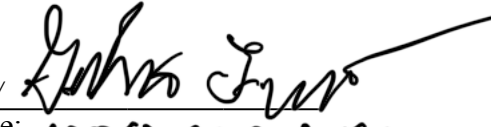
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1 DATED this 30 day of January, 2024.

2 Davis Wright Tremaine LLP
3 Attorneys for Plaintiffs Amazon.com

Graham Ferguson

4 By s/Bonnie MacNaughton
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By s/ 
Phone: (605) 406-3561
Email: gbobferg@gmail.com

15 **PERMANENT INJUNCTION**

16 Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that
17 Defendant Graham Ferguson, and his respective employees, agents, successors and assigns, and
18 all others in active concert or participation with him, are permanently enjoined and restrained
19 from:

- 20 1. Accessing and using, whether directly or indirectly via a third party, intermediary,
21 or proxy, Amazon.com, or any other Amazon online store around the world.
- 22 2. Exploiting or abusing Amazon's ordering or return services;
- 23 3. Making false statements or misrepresentations to Amazon;
- 24 4. Engaging in any activity that defrauds Amazon into paying money or providing
25 replacement products for illegitimate returns;
- 26 5. Engaging in any scheme or malicious activity that interacts with Amazon; and
- 27 6. Knowingly and materially assisting or engaging any other person or business
entity in engaging in or performing any of the activities listed above.

1 The Court shall retain continuing jurisdiction over this matter for the limited purposes of
2 enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent
3 Injunction.

4 IT IS SO ORDERED.

5 DATED: _____, 2024.

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The Honorable James L. Robart
UNITED STATES SENIOR DISTRICT JUDGE
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